



Order Filed on December 15,  
2017 by Clerk U.S. Bankruptcy  
Court District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR  
9004-1(b)**

SALDUTTI LAW GROUP  
Rebecca K. McDowell, Esquire  
800 Kings Highway North, Suite 300  
Cherry Hill, NJ 08034  
(856) 779-0300  
Attorney for Creditor Investors Bank

In Re:

JEFFREY M. KEISER,  
Debtor.

Case No.: 17-11270-JNP

Chapter: 13

Hrg Date: December 19, 2017 @ 10:00AM

Judge: Hon. Jerrold N. Poslusny, Jr.

**CONSENT ORDER ON INVESTORS BANK'S MOTION FOR RELIEF**

The relief set forth on the following page is hereby ORDERED.

**DATED: December 15, 2017**

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Page 2

Debtor: JEFFREY M. KEISER

Case No. 17-11270-JNP

Caption of Order: Consent Order on Investors Bank's Motion for Relief

---

Creditor Investors Bank ("Bank") having filed a Motion for Relief from the Automatic Stay ("Motion") as to the real property located at 12 Fredericksburg Ave., Margate, New Jersey ("Margate Property") owned by Debtor Jeffrey M. Keiser ("Debtor"); and Investors having a second mortgage on the Margate Property; and Investors having first and second mortgages on Debtor's real property located at 63 Woodthrush Trail, Medford, New Jersey ("Medford Property"); and Investors having already obtained relief from the automatic stay as to the Medford Property; and Investors having a first lien on the cash collateral of Debtor's law practice by virtue of its security agreement; and the parties having previously entered into a Consent Order dated May 8, 2017 providing for adequate protection payments and the continued listing of the Medford Property for sale, and the Motion having been originally relisted for November 14, 2017 to determine the status of the Debtor's efforts to sell the Medford Property; and the Court having entered an Order Granting Debtor's Motion to Sell the Medford Property on October 10, 2017; and the Medford Property now being scheduled to close on/before December 29, 2017; and the parties having reached an agreement as to a further resolution of the Motion;

It is on this day **ORDERED** as follows:

1. Debtor shall continue pay \$1,000.00 per month to Bank until the closing on the sale of the Medford Property.
2. If Debtor is unable to close on the sale of the Medford Property on or before December 29, 2017, then upon the filing of a certification by Bank's counsel advising of same, the Court shall hold a hearing on January 16, 2017, at 10:00 a.m. to determine whether Bank is entitled to relief from the automatic stay with respect to the Margate Property.
3. Bank shall continue to have access to both the Medford Property and the Margate

Property for purposes of inspection and appraisal.

4. Debtor shall continue to keep the Bank apprised as to the status of the closing on the sale of the Medford Property.
5. Debtor shall continue to provide the Bank with up-to-date personal financial information as may be reasonably requested by the Bank.
6. Nothing in this Order shall be deemed to preclude the continuation of the Bank's foreclosure action against the Medford Property, which Debtor has agreed not to contest.
7. Bank shall not engage in any action to execute against the property of Debtor's spouse while Debtor is in compliance with the terms of this Order.
8. In the event that Debtor fails to make the monthly adequate protection payments as required by Paragraph 1 above, then Bank may file a Certification of Default with proposed order, providing Debtor fourteen (14) days to cure the default and/or file a response; if the default is not cured and/or no response is filed, the automatic stay as to the Margate Property shall be vacated immediately upon the conclusion of the 14-day period.

<u>/s/Rebecca K. McDowell</u> Rebecca K. McDowell, Esq. Saldutti Law Group 800 Kings Highway North, Suite 300 Cherry Hill, NJ 08034 (856) 324-5014 rmcdowell@slgcollect.com Counsel for Santander Bank, N.A.  DATED: December 15, 2017	<u>/s/E. Richard Dressel</u> E. Richard Dressel, Esq. Flaster Greenberg, PC Commerce Center 1810 Chapel Ave. West Cherry Hill, NJ 08002 (856) 661-2280 rick.dressel@flastergreenberg.com Counsel for the Debtor  DATED: December 15, 2017
---	---

## Imaged Certificate of Notice Page 4 of 4

United States Bankruptcy Court  
District of New JerseyIn re:  
Jeffrey M. Keiser  
DebtorCase No. 17-11270-JNP  
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin  
Form ID: pdf903Page 1 of 1  
Total Noticed: 1

Date Rcvd: Dec 15, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on  
Dec 17, 2017.

db Jeffrey M. Keiser, 12 N Fredericksburg Ave, Ventnor City, NJ 08406-1934

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.****Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Dec 17, 2017

Signature: /s/Joseph Speetjens

---

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 15, 2017 at the address(es) listed below:

Adam D. Greenberg on behalf of Creditor PFS Financial 1, LLC agreenberg@hgllclaw.com,  
Aholmes@hgllclaw.comDenise E. Carlon on behalf of Creditor Toyota Lease Trust dcarlon@kmlawgroup.com,  
bkggroup@kmlawgroup.comE. Richard Dressel on behalf of Attorney Flaster/Greenberg PC  
rick.dressel@flastergreenberg.com, erika.letteri@ecf.inforuptcy.comE. Richard Dressel on behalf of Debtor Jeffrey M. Keiser rick.dressel@flastergreenberg.com,  
erika.letteri@ecf.inforuptcy.com

Isabel C. Balboa ecfmil@standingtrustee.com, summarymail@standingtrustee.com

Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmil@standingtrustee.com,  
summarymail@standingtrustee.com

James Patrick Shay on behalf of Creditor CitiMortgage, Inc. james.shay@phelanhallinan.com

Jennifer R. Gorchow on behalf of Trustee Isabel C. Balboa jgorchow@standingtrustee.com

Nicholas V. Rogers on behalf of Creditor CitiMortgage, Inc. nj.bkecf@fedphe.com

Rebecca K. McDowell on behalf of Creditor Investors Bank rmcdowell@slgcollect.com

U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

William M.E. Powers, III on behalf of Creditor CitiMortgage, Inc. ecf@powerskirn.com

TOTAL: 12